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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

CONNIE M. DAVIS,)	
)	Case No. C12-5502JCS
Plaintiff,)	
)	SUPPLEMENTAL DECLARATION OF SHEILA
v.)	A. REID IN SUPPORT OF PLAINTIFF'S
)	OPPOSITON TO DEFENDANTS' MOTION FOR
)	SUMMARY JUDGMENT
NIH FEDERAL CREDIT UNION;)	
JULI ANNE CALLIS;)	Date: February 21, 2014
and DOES 1-10, INCLUSIVE)	Time: 9:30 a.m.
Defendants.)	Judge: Hon. Joseph C. Spero

I, Sheila A. Reid declare:

1. I am one of the attorneys for the Plaintiff herein and I make this declaration in support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the matters stated herein, and if called upon, could and would competently testify about the following.

2. Attached hereto as Exhibit "7" is a true and correct copy of Plaintiff's Requests for Production of Documents, Set Two, served on Defendant NIH Federal Credit Union in this matter on November 8, 2013.

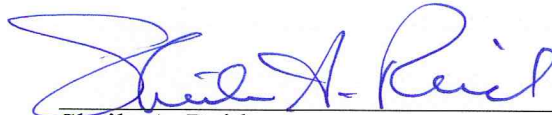
3. Attached hereto as Exhibit "8" is a true and correct copy of Defendant NIH Federal Credit Union's Response to Plaintiff's Request for Production of Documents, Set Two, served on

1 Plaintiff in this matter on December 12, 2013.

2 4. Attached hereto as Exhibit "9" are true and correct copies of "meet and confer" email
3 communications between Tyler Brown, counsel for Defendant NIH Federal Credit Union, and me,
4 dated December 13, 2013, and December 18, 2013, with the attachments referenced therein, concerning
5 Defendant NIH Federal Credit Union's documents responsive to Plaintiff's Request for Production of
6 Documents, Set Two, Request Nos. 28, 30, 35 and 37.

7 5. Plaintiff respectfully submits these documents to respond to new arguments from
8 Defendants in their Reply Brief that Mr. Duvall's declaration is the only "evidence" of Defendants'
9 intent to create a Cash Management Division because Plaintiff failed to engage in discovery. Plaintiff
10 did engage in the discovery, seeking documents and facts evidencing Defendants' intent to create a
11 cash management division (see also Reid Declaration filed January 3, 2014, Exh. 4, Defendant
12 NIHFCU's Responses to Plaintiff's Special Interrogatories, Set Two). Defendants produced no
13 responsive documents. Their only "facts" are Mr. Duvall's vague and uncorroborated statements,
14 which are contradicted by Ms. Callis, and to which Plaintiff has objected in the Memorandum in
15 Opposition to Defendants Motion for Summary Judgment.

16 I declare under penalty of perjury under the laws of the State of California that the foregoing is
17 true and correct. Executed on February 11, 2014, in Emeryville, California.

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21 _____
22 Sheila A. Reid
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